- 88. Plaintiff duly and faithfully performed under the agreement to perform work as a consultant for Valiant during the months of June and July of 2006.
- 89. The aforementioned agreement was in good faith and was coupled with full performance by Plaintiff.
- 90. Plaintiff came to realize that Defendant was not paying Plaintiff any compensation for the work performed.
- 91. Plaintiff demanded his \$11,000 paycheck, pursuant to the agreement.
- 92. To date, Defendant has refused to deliver to Plaintiff the outstanding \$11,000 compensation.
- 93. By reason of the foregoing, Defendant is indebted to Plaintiff for money had and received by Defendant on behalf of Plaintiff and wrongfully withheld, all to the monetary damage of Plaintiff.

## PRAYER FOR RELIEF

**WHEREFORE**, plaintiff Richard Selby respectfully requests that this Court enter a judgment:

- A. Finding that Defendant Whitelaw violated: Section 5 of the Securities Act [15 U.S.C. section 77e];
- B. Defendant wrongfully misrepresented to Plaintiff that he would invest \$50,000 in .

  First Asian Fuel on behalf of Plaintiff, as is alleged in this Complaint; and
- C. Finding that Defendant wrongfully misrepresented to Plaintiff he would invest \$35,000 in Vemics on behalf of Plaintiff, as is alleged in this Complaint; and
- D. Finding that Defendant breached an agreement with Plaintiff by failing to pay him for his work performed for Valiant in June through July 2006; and

- E. Order judgment against Defendant in the amount of \$96,000 as is the equivalent of Plaintiff's investments in First Asian Fuel and Vemics (totaling \$85,000), in addition to, the outstanding \$11,000 of compensation owed for work performed at Valiant;
- F. Interest at a rate to be determined by the Court;
- G. Costs associated with bringing this action including attorney's fees, filing fees, and service fees.
- H. Such further relief as this Court deems fair and reasonable.

Dated: August 17, 2010

New York, New York

Respectfully Submitted,

Bridget Butler, Esq.

Attorney for Plaintiff, RICHARD

**SELBY** 

Law Office of Bridget E. Butler, Esq.

12 Desbrosses Street

New York, New York 10013

(917) 328-7144